

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

JORGE LUIS GOMEZ ESQUILIN
DEBTORS

Case No. 17-05154 ESL
CHAPTER: 13

DLJ MORTGAGE CAPITAL, INC
c/o SELECT PORTFOLIO SERVICING, INC

MOVANT

RESPONSE TO NOTICE OF FINAL CURE OF MORTGAGE PAYMENTS

TO THE HONORABLE COURT:

COMES NOW, secured creditor **DLJ Mortgage Capital, Inc. c/o Select Portfolio Servicing, Inc.**, through the undersigned, and very respectfully STATES, ALLEGES and PRAYS as follow:

1. On July 3rd, 2019, the Chapter 13 Trustee, José Ramón Carrión Morales, filed a *Notice of Final Cure Payment*, pursuant to Federal Rules of Bankruptcy Procedure 3002.1. (f) in regards to claim number 3.

2. **DLJ Mortgage Capital, Inc.** is the creditor of the secured proof of claim number 3; here in after the "POC".

3. **DLJ Mortgage Capital, Inc.** hereby, in compliance with the Federal Rules of Bankruptcy Procedures 3002.1 (f), informs that pre-petition arrears included in the POC have not been paid in full. A check in the amount of \$2,730.88 was issued on June 28th, 2019 and sent on July 1st, 2019, nonetheless as of the date of the filling if the present motion the same has not been received.

4. Also, **DLJ Mortgage Capital, Inc.** informs by the present motion that debtor is post-petition due for the months of February to July 2019, for a total amount owed in post-petition arrears for the sum of \$3,613.28.

Wherefore, it is respectfully requested that **DLJ Mortgage Capital, Inc.** be deemed to have complied with the Federal Rules of Bankruptcy Procedures 3002.1(f).

WHEREFORE, it is respectfully requested that the master address list be amended to include the undersigned counsel and that pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, and that all notices, and documents filed in the instant case be served upon the undersigned counsel.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that this 22nd day of July, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties in the case who have been registered in said system, by regular mail to non CM/ECF participants and to Debtor, debtor's attorney and the Chapter 13 Trustee.

In Ponce, Puerto Rico, this 22nd day of July, 2019

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/s/ MARJALIISA COLON-VILLANUEVA

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MOVANT**

CERTIFICATE OF SERVICE

TO THIS HONORABLE COURT:

COMES NOW the undersigned attorney, and very respectfully certifies that on July 22nd, 2019, a true and exact copy of the motion filed by DLJ Mortgage Capital Inc., Statement Pursuant to Fed. R. Bank. P. 3002.1(g), was served by United States Postal Service's regular mail, upon Debtor to: Parcelas Nuevas Calle 33 Casa 551, Gurabo, P.R. 00778, and Debtor Attorney Roberto Figueroa Carrasquillo to: P.O. Box 186, Caguas, P.R. 00726-0186 and Chapter 13 Trustee José Ramón Carrión Morales to: P.O. BOX 9023884, San Juan, P.R. 00902-3884.

On this 22nd day of July, 2019.

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